Facility Name: **KM Phoenix Holdings - Doraville Terminal**
City: Doraville
County: DeKalb
AIRS #: 04-13-089-00130

Application #: TV-693823
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Permit No: 5171-089-0130-V-05-0

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Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Facility Identification

1. Facility Name: KM Phoenix Holdings - Doraville Terminal

2. Parent/Holding Company Name

KM Phoenix Holdings

3. Previous and/or Other Name(s)

This facility has two bulk fuel terminals (Terminal No. 2 and Terminal No. 1) which are located approximately one mile from each other. Before KM Phoenix Holdings purchased both terminals and had the corresponding ownership and name changes in 2016, the facility was known as BP Products North America - Doraville Terminal. Before owned and operated by BP Products North America - Doraville Terminal, Terminal No. 2 was owned and operated by Shell Oil Company as BP-Amoco Terminal No. 2.

However, the company currently calls another terminal in the area internally as Terminal No. 1, and the Terminal No. 3 referred in the current permit as Terminal No. 1. Per suggestion of the Division's Stationary Compliance Source Program, Terminal No. 3 in the current permit was renamed as Terminal No. 1. In the renewal permit Terminal No. 3 is referred to as Terminal No. 1 per this GEOS application 693823.

4. Facility Location

Terminal No. 1: 6430 New Peachtree Road, Doraville, GA 30340;

Terminal No. 2: 4064 Winters Chapel Road, Doraville, GA 30340

5. Attainment, Non-attainment Area Location, or Contributing Area

The facility is in DeKalb County, which is classified as an attainment area for Ozone.

B. Site Determination

Terminal No. 2 and Terminal No. 1 are on non-adjacent locations but are considered one site for the purpose of Title V permitting since they are contiguous, under common control, and have the same first two digits of their SIC codes.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
5171-089-0130-V-05-0	March 8, 2018	Title V Permit Renewal
Off-Permit Change	April 27, 2020	change the fuel additives in Tank 81, Tank 83E, and Tank 87
Off-Permit Change	May 3, 2018	Install a 8,000 gallon diesel fuel additive tank
Off-Permit Change	August 9, 2018	Replace an existing 18,330 gallon tank with a new 10,000 gallon tank for storing a gasoline additive.

D. Process Description

1. SIC Codes(s)

5171 – Petroleum Bulk Stations and Terminals

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

Products handled by this facility include gasoline, distillate oil, ethanol and additives to gasoline and distillate oil.

3. Overall Facility Process Description

The facility includes two bulk gasoline terminals (Terminal No. 2 and Terminal No. 1) which stores and distributes gasoline, distillate products, and denatured ethanol. Products are stored in floating roof, fixed roof, and horizontal storage tanks within the property. Gasoline and distillate products are received via pipeline. Denatured ethanol is received via rail car and tanker truck. Additives are received via tanker truck. All products are distributed via tanker truck.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

This facility is currently classified as a major source of VOC in the Atlanta. Total tank storage at this facility is approximately 23 million gallons which is equal to about 553,000 barrels. Potential annual emissions of VOCs from this source have been calculated to be above 25 tons. This facility is located in DeKalb County. Therefore, the NAANSR regulations are applicable to the facility instead of PSD/NSR. Since the major source thresholds for the Atlanta ozone nonattainment area are 25 tons or more per year of potential VOC emissions and NO_x emissions, this facility is considered a major source under pertinent NAA/NSR rules since the facility's potential VOC emissions exceed 25 tons per year. The facility's potential NO_x emissions, however, are less than 25 tons per year.

DeKalb county is now considered attainment for ozone. The above limits are not going to change at this time, since they are still RACT avoidance limits under State Air Quality Rules. All citations for NAANSR regulations have been removed from this permit.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	No			✓
PM_{10}	No			✓
$PM_{2.5}$	No			✓
SO_2	No			✓
VOC	Yes	✓		
NO_x	No			✓
CO	No			✓
TRS	No			✓
H_2S	No			✓
Individual HAP	yes		✓	
Total HAPs	yes		✓	

3. MACT Standards

This draft permit carries over Condition 2.2.1 from the current Title V operating permit No. 5171-089-0130-V-05-0. This condition contains a throughput limit for gasoline loaded from the facility. This production limit allows the facility to avoid being subject to 40 CFR 63, Subpart R, *"National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)"*. Conditions 3.2.2 and 3.2.1 limit the VOC emission rates from the loading

racks at Terminal Nos. 2 and 3. Part 63 NESHAP Subpart R allows two approaches to establish that an affected facility/source is a minor for HAPs emissions. One approach is to establish that the emissions screening factor for bulk gasoline terminals under Subpart R, i.e., E_T is less than 1. The other approach is to establish that the facility is a minor/area source to the Division's satisfaction. This facility has elected the second approach via the combination of limits in Conditions 2.2.1, 3.2.1 and 3.2.2. The resulted potential HAPs emissions were estimated at 8 tons per year based on these limits. Since the facility has elected the second option, none of the E_T references are necessary.

Nonetheless, as an area/minor source of HAPs emissions, this facility is subject to 40 CFR Part 63, Subpart BBBBBB, *"National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities"*. This rule establishes Generally Available Control Technology (GACT) requirements for affect facilities under Part 63 NESHAP rules.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	Yes
Program Code M – Part 63 NESHAP	Yes
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

This facility has a 25-ton per year VOC emission limit for ethanol handling. This limit keeps a previous modification of allowing the facility to handle ethanol from becoming a major modification under pertinent NAA/NSR provisions. These limits are not going to change at this time, since they are still RACT avoidance limits under State Air Quality Rules. All citations for NAANSR regulations have been removed from this permit.

In conjunction with the VOC emission rate limits in Conditions 3.2.1 and 3.2.2, the 30-day rolling throughput limit of 100,426,160 gallons for gasoline in Condition 2.2.1 also allows facility to remain a minor/area source for HAPs emissions.

B. Applicable Rules and Regulations

Facility-wide air quality applicable rules include 40 CFR Part 60, Subpart A, *"General Provisions"*, and 40 CFR Part 63, Subpart A, *"General Provisions"*.

The facility shall also comply with the provisions of 40 CFR 63, Subpart R that assure continued non-applicability of the subpart and continue to maintain its area/minor source status with regard to HAPs emissions.

Calculations of Emission Screening Factor E_T are not needed for this facility as long as it complies with applicable record keeping and notification requirements for determination of E_T as specified in 40 CFR 63, Subpart R.

This facility is also subject to applicable general provisions in Part VIII of the permit and the general provisions contained in Rule 391-3-1-.02(2)(a).

C. Compliance Status

Review of the Title V permit application No. TV-693823 and the Facility Permit Files indicates that the facility is operating in compliance with all applicable rules and regulations.

D. Permit Conditions

Condition 2.1.1 was carried over from the current permit. This condition limits the potential VOC emissions from the handling of ethanol at this facility to less than 25 tons during any consecutive 12 months. This emission limit is now subject to RACT and will not change at this time.

Condition 2.2.1 was carried from the current permit. In conjunction with the VOC emission rate limits in Conditions 3.2.1 and 3.2.2, the 30-day rolling throughput limit for gasoline in this condition allows this facility to remain a minor/area source for HAPs emissions under pertinent HESHAP Part 63 rules.

Both Conditions 2.2.2 and 2.2.3 were carried over from the current permit. Condition 2.2.2 requires the Permittee to comply with the applicable general requirements as specified in Table 5 to 40 CFR Part 63, Subpart BBBBBB. Condition 2.2.3 states that, as allowed by §63.420(2) of 40 CFR Part 63, Subpart R, the facility has elected the approach which allows the facility to become a minor/area source to Division's satisfaction via the gasoline through limit in Condition 2.2.1, in conjunction with the VOC emission rate limits in Conditions 3.2.1 and 3.2.2.

III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Emission Unit Limitations*	Air Pollution Control Device	
ID No.	**Description**	**Applicable Requirements/Standards**	**ID No.**	**Description**
Terminal No.1				
TK2 - 7	Petroleum product and ethanol storage tank	391-3-1-.02(2)(bb) 40 CFR 63, Subpart BBBBBB	N/A	Internal Floating Roof
TK8 & 9	Petroleum product and ethanol storage tank	391-3-1-.02(2)(bb) 40 CFR 60 Subpart Kb 40 CFR 63, Subpart BBBBBB	N/A	Internal Floating Roof
TLR1	Gasoline Transport Vehicles Loading Rack	391-3-1-.02(2)(ss) 391-3-1-.02(2)(cc) 40 CFR 63, Subpart BBBBBB	VRU-1	Vapor Recovery Unit
Terminal No. 2				
TK10, 31, 32 & 50	Petroleum product and ethanol storage tank	391-3-1-.02(2)(bb) 40 CFR 63, Subpart BBBBBB	N/A	Internal Floating Roof
TK60	Petroleum product and ethanol storage tank	391-3-1-.02(2)(bb) 40 CFR 60 Subpart Kb 40 CFR 63, Subpart BBBBBB	N/A	Internal Floating Roof
TK30 & 70	Petroleum product storage tank	None	N/A	Fixed Roof
TLR2	Gasoline Transport Vehicles Loading Rack	391-3-1-.02(2)(ss) 391-3-1-.02(2)(cc) 40 CFR 60 Subpart XX 40 CFR 63, Subpart BBBBBB	VRU-2 VCU	Vapor Recovery Unit Vapor Combustion Unit (back up)

B. Equipment & Rule Applicability

Emission and Operating Caps:

Each of the primary emission control systems, i.e., the active carbon adsorption vapor control units (identified as VRU-1 and VRU-2) used by the facility, is required to maintain a control efficiency of at least 90% and not have VOC emission rates that exceed 80 milligrams per liter of gasoline or ethanol loaded at Terminal No. 1 and exceed 35 milligrams per liter of gasoline or ethanol loaded at Terminal No. 2. The 90% control requirement is from Georgia Rule for Air Quality Control 391-3-1-.02(2)(cc) which also requires that emissions not exceed 80 milligrams per liter of gasoline loaded.

Terminal No. 2 had a NSPS modification in the past which made it subject to the 80 mg/liter VOC emission rate limit under 40 CFR Part 60, Subpart XX, *"Standards of Performance for Bulk Gasoline Terminals"*. The previous owner took a more stringent 35 mg/liter VOC emission rate limit. In conjunction with the throughput limit in Condition 2.2.1, this limit allowed the modification to remain minor, and therefore avoided NAA/NSR.

DeKalb county is now considered attainment for ozone. The above limits are not going to change at this time, since they are still RACT avoidance limits under State Air Quality Rules. All citations for NAANSR regulations have been removed from this permit.

The same limit also allows the facility to remain a minor/area source for HAPs emissions, and therefore avoid being subject to 40 CFR Part 63, Subpart R. Rule (cc) also requires the VOC control/destruction efficiency of the VCU being used as backup to the VRU-2 at Terminal No. 2 to be equal to or greater than 90%.

Rules and Regulations Assessment:

Georgia Rule 391-3-1-.02(2)(cc), *"Bulk Gasoline Terminals"*, applies to this facility and its loading racks. A gasoline terminal is defined in Rule (cc) as a facility which receives gasoline by pipeline, dispenses it to trucks and has an average daily throughput of greater than 20,000 gallons. Rule (cc) requires affected gasoline terminals to operate a vapor collection and adsorbing or condensation system which has at least 90% of recovery efficiency, or to operate control equipment having control efficiency equivalent to or greater than that for the vapor adsorbing or condensation system. Rule (cc) also limits the VOC emission rate to no more than 80 milligrams per liter (4.7 grains per gallon) of gasoline loaded. This facility meets all of these requirements by operating a vapor recovery unit (VRU) as primary at each of the Terminal Nos. 2 and 3, and a vapor combustion unit (VCU)/flair as backup control of VOC emissions at Terminal No. 2. Because its VOC emissions are subject to this more specific state rule, this facility is exempt from Georgia Rule 391-3-1-.02(2)(tt), *"VOC Emissions from Major Sources"*.

Georgia Rule 391-3-1-.02(2)(bb), *"Petroleum Liquid Storage"*, applies to Tanks 2 thru 10, 31, 32, 50 and 60 since each of these tanks has a capacity of more than 40,000 gallons and is capable of storing a product with a vapor pressure of greater than 1.52 psia. Each of these tanks is in compliance with Rule (bb) by having an internal floating roof.

Georgia Rule 391-3-1-.02(2)(ss), *"Gasoline Transport Vehicle and Vapor Collection Systems"*, applies to any entity involved in the loading or unloading of gasoline into gasoline transport vehicles, which is the primary business at this facility. The facility shall, therefore, take steps to insure that it only loads gasoline into tanker trucks that have passed a vapor tightness test to ensure that they do not leak. This Rule is also automatically applicable to any facility that is subject to Rule (cc).

40 CFR 60, Subpart Kb, *"Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984", applies to* Tanks 8, 9 and 60. The Permittee is required to visually inspect the roof and seals for tanks fitted with internal floating roofs to meet the requirements under Subpart Kb. Periodic inspections are required following the initial filling of the tank. Repairs are required to be made as necessary. The facility is required to keep records of the inspections and report problems to the Division as directed by the subpart. The facility is required to provide notification to the Division prior to filling or refilling to afford the Division an opportunity to conduct a tank inspection.

40 CFR 60, Subpart XX, *"Standards of Performance for Bulk Gasoline Terminals"* applies to any gasoline terminal constructed or modified after December 17, 1980. The loading racks at this facility must meet the emission limit of 80 milligrams (of VOCs) per liter of gasoline loaded for existing vapor collection system. In addition to the emission limit, Subpart XX contains certain equipment standards to ensure a vapor tight loading system and requires that the terminal only load gasoline into tanks that have been tested and shown to be vapor tight. Record keeping ensuring compliance with these requirements is also required. Having a NSPS modification after December 17, 1980, Loading Rack TLR2 at Terminal No. 2 is subject to this NSPS standard. The previous owner took a more stringent VOC emission limit (35 mg/liter of gasoline loaded) than required by NSPS Subpart XX (80 mg/liter of gasoline loaded) in order to avoid non-attainment area new source review before making the NSPS modification to the Loading Rack TLR2. The vapor recovery unit (VRU-2) is also subject to this VOC emission limit.

40 CFR Part 63, Subpart R, *"National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)"* establishes emission standards for gasoline distribution facilities, including bulk gasoline terminals and pipeline breakout stations that are major sources of HAP. This facility has been able to remain a minor/area source of HAP emissions via fuel throughput limit and VOC emission rate limits, and, as a result, is not affected by Subpart R. Instead, this facility is subject to 40 CFR 63 Subpart BBBBBB, *"National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities".* Subpart BBBBBB requires each gasoline storage tank with a capacity of less than 75 m3 (19,812 gallons) to be equipped with a fixed roof. Subpart BBBBBB also has specific structural and operational requirements for external floating roofs and internal floating roofs for tanks subject to the rule. Subpart BBBBBB also limits the VOC emissions from gasoline loading racks to no greater than 80 mg/l of gasoline loaded, which is the same as the limit in Georgia Rule (cc). This facility shall also comply with applicable operating, monitoring, testing, inspection, maintenance and recordkeeping and reporting requirements under Subpart BBBBBB. These requirements are identical to those in 40 CFR Subparts Kb and XX, since such requirements in Table 1 to Subpart BBBBBB refers to 40 CFR Part 60, Subparts Kb and XX. Subpart BBBBBB also institutes a leak inspection program and additional record keeping requirements.

This facility is not subject to 40 CFR Part 64, *"Compliance Assurance Monitoring (CAM)"*, since it is subject to 40 CFR 63, Subpart BBBBBB, a NESHAP standard promulgated after November 15, 1990, and has continuous emission monitoring systems (CEMSs) at each of the vapor/VOC collection/control systems located at Terminal Nos. 2 and 3. In complying with the CEMS monitoring requirements of 40 CFR Part 63, Subpart BBBBBB, this facility is considered to be in compliance with CAM-like requirements already.

C. Permit Conditions

Condition 3.2.1 was carried over from the current permit. Per Rule (cc), this condition limits the maximum VOC emission rate to less than 80 mg/l for truck loading of gasoline and ethanol at Terminal No. 1 and specifies the minimum control efficiency required for the vapor collection/control system. This condition helps to keep the facility a synthetically minor/area source for HAPs emissions, thus allowing the facility to avoid being subject to the gasoline MACT standard, 40 CFR 63, Subpar R. The wording and rule citation of this condition were slightly revised for clarity.

Condition 3.2.2 was carried over from the current permit. Since Loading Rack TLR2 at Terminal No. 2 had a NSPS modification after December 17, 1980, it is also subject to 40 CFR Part 60, Subpart XX. In order to allow this modification to avoid non-attainment area new source review (NAA/NSR), the previous owner took a more stringent VOC emission rate limit (35 mg/liter of gasoline loaded) than required by NSPS Subpart XX and Rule (cc) (80 mg/liter of gasoline loaded). This condition also specifies the minimum control efficiency required for the vapor collection/control system. Both standards in this condition also help to keep the facility a synthetically minor/area source for HAP emissions, thus allowing the facility to avoid being subject to the gasoline MACT standard, 40 CFR 63, Subpar R. In addition, the wording and rule citation of this condition were slightly revised for clarity.

Condition 3.2.3 was carried over from the current permit. This condition establishes the operating requirements for ensuring the proper operation and therefore the compliance with the applicable emission limits for both the VRU-2 and the VCU.

Carried over from the current permit and updated to include double seals for control technology, Condition 3.3.1 contains the applicable requirements of 40 CFR, Part 60, Subpart Kb for internal floating roof tanks, and applies to Tanks 8 and 9 in Terminal No. 1 and Tank 60 in Terminal No. 2 since they were constructed, reconstructed, or modified after July 23, 1984. Since they are either equal or more stringent, the facility could opt to comply with subparagraphs a through c of this condition as the elected method of showing compliance with 40 CFR 63, Subpart BBBBBB.

Condition 3.3.2 was carried from the current permit. Loading Rack TLR2 at Terminal No. 2 had a NSPS modification after December 17, 1980 and therefore is subject to the applicable requirements of 40 CFR Part 60, Subpart XX. Condition 3.2.2 requires that gasoline only be loaded via this loading rack into vapor tight trucks and records be kept by the facility to ensure compliance with this requirement. These requirements are taken directly from 40 CFR Part 60, Subpart XX.

Condition 3.3.3 was carried over from the current permit. This condition contains applicable structural specifications/requirements for fuel storage tanks subject to 40 CFR 63 Subpart BBBBBB. Table 1 to Subpart BBBBBB allows the use of single seal system on tanks not subject to 40 CFR Part 60, Subpart Kb, and therefore makes the use of double seal on those non NSPS tanks optional. Subparagraph b.iii. was added to this condition to incorporate this requirement. Currently two tanks at this facility are equipped with the single seal system. However, for tanks constructed, reconstructed, or modified after July 23, 1984, and therefore subject 40 CFR Part 60, Subpart Kb, they have to have double seal system if this option is elected by the facilities.

Conditions 3.3.4, 3.3.5 and 3.3.6 were carried over from the current permit. These conditions contain applicable operating, emission control, equipment and documentation requirements for gasoline loading racks (including gasoline tank trucks being loaded) subject to 40 CFR 63, Subpart BBBBBB.

Condition 3.4.1 was carried over from the current permit. This condition requires compliance with Rule (bb) as to have floating roofs on large gasoline storage tanks, or as to fit each of these tanks with a control device of equal or greater control efficiency than the floating roof. All affected tanks at this facility have floating roofs. 40 CFR Part 63, Subpart BBBBBB and 40 CFR Part 60 Subparts K and Kb have similar but stricter requirements.

Carried over from the current permit, Condition 3.4.2 requires the facility to comply with Rule (cc) and contains detailed applicable operational and emission control requirements for VOC/gasoline vapor emission control systems involved. The facility is complying with the VOC emission limit in this condition via compliance with the VOC emission limits in Conditions 3.2.1 and 3.2.2 using VRU and VCU.

Carried over from the current permit, Condition 3.4.3 requires the Permittee to comply with the operating, emission control, testing, record keeping and notification requirements of Rule (ss) as detailed in the condition.

Condition 3.4.4 was carried from the current permit. This state only enforceable condition requires painting and repainting, using a paint of a heat-reflective nature, of all above ground tanks with a capacity of 40,000 gallons or greater and used to store petroleum liquid with a true vapor pressure of 1.5 psia or greater.

Both Conditions 3.5.1 and 3.5.2 were carried from the current permit. Condition 3.5.1 contains requirements for routine maintenance on all air pollution control equipment. Condition 3.5.2 requires the keeping of a spare parts inventory for the vapor collection/control systems being used at the facility. This condition was reworded for clarity. Both conditions will ensure the proper function of air pollution control equipment used for minimizing VOC emissions, and the compliance with the applicable VOC emission limits.

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

Condition 4.2.1 in the current permit was updated to incorporate more detailed information about the applicable testing requirements for the VRUs at this facility.

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

Condition 5.2.1 was carried over from the current Title V permit with a revision that requires each of the breakthrough monitors serving VRU-1 and VRU-2 to meet the requirements for CEMS, as required by 40 CFR Part 63, Subpart BBBBBB. Usually provided by the manufacturers/suppliers of the VRUs, each monitor is either a Flame Ionization Analyzer (FIA) based on EPA Method 25A, or a Nondispersive Infrared Analyzer (NIDA) based on EPA Method 25B, as specified in Condition 4.1.3. Both analyzers can continuously determine the concentration of total gaseous organic compounds (as total organic carbon as propane) in air streams entering and/or exhausting from the VRUs, and in the latter case compare the total organic carbon (TOC) concentration with a preset breakthrough point/value to alert and prevent the breakthrough of the VRU. The breakthrough point (preset TOC value for the FIA or NIDA) defined in this condition generally corresponds to the VOC emission rate limits in Conditions 3.2.1 and 3.2.2. By continuously determining/monitoring the TOC concentrations in air streams exhausting from the VRUs, both monitors are functioning as CEMS. In addition, an interlock system connected to each monitor will shut down automatically gasoline loading operations involved when a breakthrough to the applicable VOC emission rate limit occurs, or when other critical operating parameters of the VRU system are not meet.

Condition 5.2.2 was revised to require CEMS to be used to monitor the VOC emissions from both of the VRU systems at this facility per 40 CFR, Part 63, Subpart BBBBBB. This condition also defines the appropriate breakthrough values corresponding to the applicable VOC emission rate limits.

The breakthrough monitors serving VRU-1 and VRU-2 meet the applicable CEMS requirements under 40 CFR, Part 63, Subpart BBBBBB.

Condition 5.2.3 was carried over from the current permit. This condition specifies the operating requirements for the interlock systems being used at this facility. Working with CEMS, the interlock systems will minimize VOC emissions and enhance compliance.

Carried over from the current permit, Condition 5.2.4 requires the Permittee to install a pressure measurement device on each terminal's vapor collection system and specifies the required range and precision of the device. The weekly inspection requirement ensures the proper function of the vapor collection systems at this facility.

Both Conditions 5.2.5 and 5.2.6 were carried from the current permit. Condition 5.2.5 requires the Permittee to inspect the vapor staging valves of the VRU weekly and keep records of the inspection. This requirement ensures the valves working properly (i.e., releasing vapor into carbon beds in working cycle and blocking vapor from entering carbon beds in regeneration/devaporization cycle). The operating, monitoring and inspection requirements for VRUs' safety relief valves or bypass valves in Condition 5.2.6 help to minimize VOC emissions.

Conditions 5.2.7, 5.2.8 and 5.2.9 were carried from the current permit. These conditions incorporate applicable record keeping, inspection, and maintenance/repair requirements for tanks subject to 40 CFR Part 60, Subpart Kb. Condition 5.2.7 also was slightly reworded for clarity.

Conditions 5.2.10, 5.2.11, 5.2.12, 5.2.13 and 5.2.14 were carried from the current permit. These conditions contain applicable inspection, maintenance/repair, record keeping, notification and/or reporting requirements under 40 CFR Part 63, Subpart BBBBBB for all the production and vapor collection/control equipment at the facility.

Condition 5.2.15 was added to establish the operating requirements for the VCU when it is operated as backup to VRU-2 for VOC emission control at Terminal No. 2. This is a standard condition in permits recently issued by the Division to other fuel terminals in Georgia.

C. Compliance Assurance Monitoring (CAM)

Not Applicable

Conditions requiring CAM were eliminated because this facility is exempt from CAM rule.

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements

Condition 6.2.1 is a carryover from the current permit and contains a necessary record keeping requirement for compliance with the gasoline throughput limit in Condition 2.2.1.

A carryover from the current permit, Condition 6.2.2 contains applicable record keeping requirements from storage tanks subject to 40 CFR Part 60, Subpart Kb.

Conditions 6.2.3, 6.2.4, 6.2.5 and 6.2.6 were all carried over from the current permit. The record keeping and reporting requirements for equipment leak and repair, CEMS monitoring data, and malfunction and maintenance of vapor collection/control systems ensure the compliance with applicable VOC emission limits and operating requirements and minimize the VOC emissions from this facility.

Condition 6.2.7 was carried over the current permit. This condition first specifies applicable time limits for repairing defective tanks (Tanks 8, 9 and 60) subject to 40 CFR Part 60, Subpart Kb. Then it establishes time limits for repairing defective tanks not subject to Subpart Kb. On June 6, 2012, the previous owner (BP Products North America) of this facility made a comment on an old version of this condition contained in draft Title V operating permit No. 5171-089-0130-V-03-0. According to this comment, *"BP submitted a Notice of Compliance Status (NOCS) on January 6, 2011 to the Unites States Environmental Protection Agency (USEPA) and the Georgia Environmental Protection Division (GA EPD) regarding the Gasoline Distribution Generally Available Control Technologies (GD GACT) regulations (40 CFR 63 Subpart BBBBBB). Within that letter, BP chose to apply the regulations of 40 CFR 63 Subpart WW (40 CFR 63.1063) to Tanks 2, 3, 4, 5, 6, 7, 10, 31, 32, & 50. The Subpart WW regulations allow for two 30-day extensions. It is BP's desire to comply with the contents of previous regulatory submittals. BP requests that the permit be modified to allow for compliance with the 40 CFR 63 Subpart WW regulations, as allowed under 40 CFR 63.11087(a)."* The Division accepted the comment and revised the original Condition 6.2.7 into the current version which allows "For all other tanks, the owner or operator may use up to 2 extensions of up to 30 additional days each….". In addition, a correction was made in first sentence of the condition as to change Tank 10 to Tank 60. Rule citation was also updated for clarity.

Condition 6.2.8 was carried over from the current permit. This condition contains notification requirements under 40 CFR, Part 63, Subpart WW, *"National Emission Standards for Storage Vessels (Tanks) - Control Level 2"*.

Carried over from the current permit, Condition 6.2.9 contains detailed record keeping requirements for the monthly leak inspection specified in Condition 5.2.12 under 40 CFR Part 60, Subpart XX.

Condition 6.2.10 was carried over from the current permit. This condition contains record keeping and compliance determination requirements for handling of ethanol at this facility.

Conditions 6.2.11 thru 6.2.17 were all carried over from the current permit. These conditions contain detailed applicable record keeping and reporting requirements for equipment malfunction, inspection, description, testing, and leakage under 40 CFR Part 63, Subparts BBBBBB and XX, and under 40 CFR Part 60, Subpart Kb.

VII. Specific Requirements

A. Operational Flexibility

Not applicable

B. Alternative Requirements

None applicable

C. Insignificant Activities

See Permit Application on GEOS website.
See Attachment B of the permit

D. Temporary Sources

None

E. Short-Term Activities

None

F. Compliance Schedule/Progress Reports

None

G. Emissions Trading

Not applicable

H. Acid Rain Requirements

None

I. Stratospheric Ozone Protection Requirements

Not applicable.

J. Pollution Prevention

None

K. Specific Conditions

None

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//